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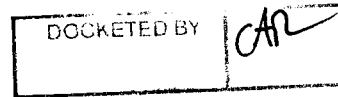
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DOCKET NO. T-00000A-97-0238

IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S COMPLIANCE  
WITH § 271 OF THE  
TELECOMMUNICATIONS ACT OF 1996.

**QWEST CORPORATION'S NOTICE OF COMPLIANCE REGARDING  
CLEC ACTUAL EDI RESPONSE TIMES**

Qwest Corporation (Qwest) hereby provides notice of its compliance with the requirement to develop the capability to report actual CLEC Pre-Order/Order Response Times for EDI transactions as requested in the Arizona Corporation Commission Staff's Impasse Issue #940 Resolution: Use of IRTM for PID PO-1B.

Staff's impasse resolution requires Qwest, by year end 2002, to (a) complete development that will measure actual EDI response times at Qwest's Interactive Agent (IA) and (b) track these results with PO-1B until the 18 and/or 24 month review, at which time a decision will be made whether to modify the PIDs to utilize EDI response times as measured at the Qwest IA.<sup>1</sup>

<sup>1</sup> Staff's Impasse #940 resolution: Use of IRTM for PID PO-1B at section E.

Consistent with Staff's decision, Qwest has developed and implemented a measurement capability to capture response times for CLECs' actual EDI transactions. Beginning in April 2003, Qwest proposes to report monthly aggregated results for CLEC actuals on a quarterly basis until the 18 and/or 24 month review. In this quarterly report, Qwest will provide regional results for CLEC actuals and IRTM, including results for CLECs on any version of EDI.

In addition to the results of actual CLEC transactions, the report will include the published IRTM regional results for the same time period, and the number of observations per transaction type. A separate chart will be provided for each month of the quarter to facilitate comparison. A template for the results report to be provided on a quarterly basis is shown below:

| IRTM Vs CLEC EDI Actuals (ALL CLECs & Excluded IRTM & All Releases) Comparison - Jan 2003 |                |      |          |          |               |                |                 |
|---|----------------|------|----------|----------|---------------|----------------|-----------------|
| CLEC  | TRANS. TYPE    | CLEC |          | IRTM     | Avg. IA       | Avg. IA        | (CLEC Avg. IA   |
|   |                | Obs. | Avg.     | Avg.     | Process Time  | Process Time   | process)(5)=    |
|   |                |      | Time (1) | Time (2) | (Inbound) (3) | (Outbound) (4) | (1) - (3) - (4) |
| ALL CLECs   | ADDRVAL        |      |          |          |               |                |                 |
| (Excluded IRTM  | SERVAVAL       |      |          |          |               |                |                 |
| CLEC)   | CSR            |      |          |          |               |                |                 |
|   | APPTSCHED      |      |          |          |               |                |                 |
|   | TN             |      |          |          |               |                |                 |
|   | FACCHECK       |      |          |          |               |                |                 |
|   | ADSL LOOPQUAL  |      |          |          |               |                |                 |
|   | RESALELOOPQUAL |      |          |          |               |                |                 |
|   | CFA            |      |          |          |               |                |                 |
|   | MPQ            |      |          |          |               |                |                 |

Please note that, as shown in the sample table above, Qwest will report results of aggregated CLEC actuals with and without IA processing time. This is necessary to support a proper, apples-to-apples, comparison of the results from actual transactions with results from IRTM transactions since that processing time by Qwest's IA as captured in actual transactions is different than the IA time captured by IRTM transactions. IA processing time is directly affected by a CLEC's selection of hardware and software. In contrast, even though the IRTM results do include IA processing, that IA time does not and cannot include the effects of CLEC equipment


that affect IA actuals. Instead, the IA time captured by IRTM represents performance from Qwest's hardware and software that are designed to efficiently operate with the IA. Thus, the IRTM results reflect the IA time that Qwest is capable of supporting, whereas the results from actual transactions includes additional IA time injected by CLEC equipment and software. The CLECs' technical decisions are clearly beyond Qwest's control; therefore, it is necessary to compare the actual and IRTM EDI response times without this intervening factor.

In comparing actual results to IRTM results it will also be important to note that for two transactions, Customer Service Record (CSR) and Facility Availability (FAQ), the CLEC EDI actual results will include transactions that are excluded per the requirements of PO-1B. At this time the product level information captured for the actual transactions does not include sufficient detail to enable Qwest to limit the transactions to non-complex services, including residential, simple business, or POTS accounts and exclude ADSL or accounts >25 lines as defined in the PO-1 PID. Consequently, CLEC actual results for the purpose of performing dual tracking with PO-1B will reflect all CSR and FAQ queries regardless of account type or line size. Qwest continues to pursue the ability to exclude these transactions; however until such time as that capability exists, evaluation of differences between CLEC actual EDI transactions and IRTM results will need to take this into consideration.

In conclusion, this notice serves as documentation that Qwest has met the requirements of the Staff's impasse resolution requiring Qwest to develop the capability to measure actual EDI transactions by year-end 2002. As stated, performance results for EDI transactions gathered with this measurement capability will be reported in the first quarterly report, which will be provided beginning no later than April 30, 2003.

RESPECTFULLY SUBMITTED this 12<sup>th</sup> day of February, 2003.

By:



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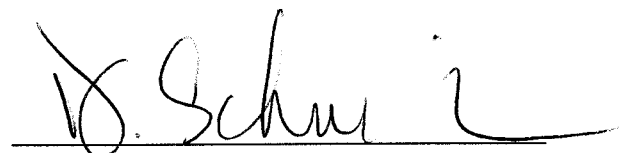
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A handwritten signature in dark ink, appearing to read "D. Schum", is written over a horizontal line.